Although the petition refers to separation of bandwidths, it neglects to recommend alternative band segments below 28 MHz. Without a more comprehensive recommendation, this petition effectively seeks elimination, not separation, of Pactor III.
I favor the present FCC rules which provide few limitations on bandwidth of digital data signals. This encourages amateur radio operators to advance the state of the art of digital technology.

I oppose the RM-11392 petition by Mark D. Miller seeking to change Amateur Radio Service automatically controlled data stations and narrower bandwidths on HF.

I oppose the petition's proposed method of changing the automatically controlled station data subbands. The use of automatically controlled data stations has increased tremendously since the original FCC rule was written. We do need change, to increase the spectrum available for automatically controlled stations.

I use automatically controlled data stations and networks on the HF amateur radio bands very often. The ability to have wider bandwidths and freedom to pick any clear frequency in the data subbands is essential for the effective operation of these systems. The services these systems provide are essential for emergency communications, furthering the purpose of amateur radio, and they are part of amateur radio's reason to exist. Please do not limit their bandwidth or spectrum any further than the existing rules already do. If anything, please expand the automatic subbands, because there has been a very large increase in use of these as technology has advanced since the rules were written.

I use digital data bandwidths wider than 1.5kHz on HF amateur radio service bands on a daily basis. The petition seeks to take this away from me. Please do not allow it.

In today's amateur radio digital environment, the 300 baud symbol rate limit prevents USA amateur radio operators from communicating with some of the digital transmissions that amateurs of other countries are presently using. Please abolish this antiquated rule.

Please abolish the 300 baud symbol rate limit, because it prevents the amateur radio service from utilizing existing federal standard digital data methods for interoperation, inter-service compatibility, economical equipment, and common signalling methods.

Please do not implement any of the provisions of the RM-11392 petition. They would set ham radio back to the stone age of HF digital data communications.

Please increase the frequency spectrum for automatically controlled data stations. It would alleviate crowding and facilitate efficiency on the amateur radio bands, to widen the automatically controlled data subbands to the following frequency band segments: 1805kHz-1825kHz, 3575-3600kHz, 7100-

7125kHz, 10130-10150kHz, 14090-14099kHz, 14101-14150kHz, 18090-18110kHz, 21090-2150kHz, 24900-24930kHz, 28100-28189kHz.

RM-11392 petition has not presented a compelling need to change the rules for Automatically Controlled Data Stations on the HF bands.

Several of the primary established HF emergency communications networks currently in service and utilized by thousands of Amateur Radio Operators in USA would be totally eliminated or hobbled if the objectives of the RM-11392 petition were to be adopted.

The Amateur Radio Service relies upon international communications standards. Many of the present digital data communications standards require bandwidths in excess of 1.5kHz. The normal amateur radio service bandwidth limit by governments of other countries is 6kHz.

The FCC Amateur Radio Service's automatically controlled data sub-bands are already too narrow for the huge volume of traffic that runs on them. If a limit of 1.5kHz bandwidth is applied, it will severely hamper the ability of amateur radio operators to share these small band segments efficiently through rapid data time division methods.

The RM-11392 petition is an attempt to kill innovation, technology advancement, and emergency data communications in the Amateur Radio Service. Please do not let this happen.

The RM-11392 petition is comparatively similar to an Analog Cellular Phone service entity trying to eliminate newer Digital Cellular Phone service. The fact is, Amateur Radio is now using faster time-multiplexing digital methods to enable more stations to efficiently use the same frequency channels simultaneously or in rapid succession. These time division techniques require at least 3kHz of bandwidth.

The RM-11392 petition is simply a selfish attack by an individual who wants us to use only 20th Century "frequency-division" techniques. He is trying to eliminate new innovative 21st Century "time-division" techniques from the ham bands. Please don't allow him to succeed.

The RM-11392 petition is very bad for the Amateur Radio Service.

The RM-11392 petition seeks to destroy 21st century digital data technology advancement in the Amateur Radio Service. Please do not turn back the clock on digital data to the 20th century.

The RM-11392 petition seeks to destroy digital data technology advancement in the Amateur Radio Service.

The RM-11392 petition seeks to re-define an automatically controlled data station. The present definition has served the amateur radio service very well. Please do not change it in the way the petitioner seeks. Instead, please expand the subbands for automatically controlled data stations. The automatically controlled data station subbands are already too narrow on the 40 meter band (5kHz), the 80 meter band (15kHz), and the 17 meter band (5kHz).

The RM-11392 petition's proposed 1.5kHz bandwidth limit on data emission is too narrow for established international standard transmissions and equipment bandwidths used by the Amateur Radio Service.

The objectives of the petition would kill the only 24/7 HF emergency data ham radio service that can be accessed without an external computer.

The operators of other, non-automatically-controlled modes have many frequency options (almost 900 KHz) below 28 MHz and on every band therein. Claims of undue interference seem disingenuous when operators choose to park in the few narrow slots where automatic control is authorized.

The petition brings to question the FCC limitation for HF data symbol rates. Please delete the 300 baud symbol rate limit from the FCC rules. It was only valid in the mid-20th century when we only had simple FSK transmissions.

The petition suggests that Pactor II is just as spectrally efficient and that Pactor III's increased bandwidth under favorable propagation conditions is inherently bad. Both arguments ignore the increased throughput and correspondingly shorter transmission time that go with higher speed and bandwidth. Fixed-length messages take less time to transmit at higher speeds, leaving the frequencies clear for longer periods of time.

The petitioner cites the current rule for HF symbol rate limitation of 300 baud on data transmissions. This rule is obsolete and serves no purpose in the 21st century.

There is a huge installed base of Amateur Radio Equipment, and millions of dollars of monetary investment by thousands of Amateur Radio Operators that use HF digital data systems with more than 1.5kHz bandwidths. This investment by FCC-licensed operators would be taken away or rendered useless if the objectives of the RM-11392 petition were to be adopted.

I oppose the petitioner's proposed method of changing the automatically controlled station data subbands. The use of automatically controlled data stations has increased tremendously since the

original FCC rule was written. We do need change, to increase the spectrum available for automatically controlled stations. It would help alleviate crowding and facilitate efficiency on the amateur radio bands, to widen the automatically controlled data subbands to the following frequency band segments: 1805kHz-1825kHz, 3575-3600kHz, 7100-7125kHz, 10130-10150kHz, 14090-14099kHz, 14101-14150kHz, 18090-18110kHz, 21090-21150kHz, 24900-24930kHz, 28100-28189kHz.

Thousands of licensed Amateur Radio Operators would be disenfranchised if the objectives of RM-11392 were to be adopted.

I do not notice or have had any interference when using digital modes at their current bandwidth, I do not want my equipment to become obsolete, I do not want to be limited to low-speed communications, I do not see how this rule will benefit all licensees, if there is proof, however, then please prove me wrong.